

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

  
U.S. Magistrate Judge

UNITED STATES OF AMERICA

v.

KENNETH EDWARD STAFFORD, et al.

No. 3:13-00097

Judge Knowles

**MOTION TO AMEND CONDITIONS OF  
PRE-TRIAL RELEASE**

The United States, through Acting United States Attorney David Rivera and Assistant United States Attorney Brent A. Hannafan, hereby requests this Court amend the conditions of pre-trial release of certain defendants by adding a condition that those defendants be refrained from possessing a firearm, destructive device, or other dangerous weapon.

This case involves twenty-four defendants, most of whom were arrested and initially appeared before this Court on June 3, 2013. Due to an oversight by the undersigned during the initial appearances of certain defendants, the United States did not request that this Court order the special condition of release of refraining from possessing a firearm, destructive device, or other dangerous weapon. This additional condition of release – Condition No. (8)(n) – was imposed on certain defendants after the undersigned and the probation office realized the oversight.

The undersigned has been advised that the residences of some defendants who do not have that special condition have firearms in their residences. The Probation Office has therefore requested the undersigned request that the following defendants have their conditions of release amended for the safety of the probation officers who are supervising them:

[4] Nicholas Adam Young  
[5] Michael Anthony Jordan  
[6] Ronnie Dustin E. McCulloch  
[7] Dereck Scott Weatherspoon  
[8] William Chad Nixon  
[11] Fletcher Denning  
[13] Tammy Bristow  
[15] Marcy Jo Pickler  
[16] Kyle Oakley  
[17] Amy Nichole Murphy  
[20] Thomas Roberts  
[21] Robert Anthony Taylor  
[22] Sammie Lanette Crutcher  
[23] Peter Lewis  
[24] Ryan Moore

### **CONCLUSION**

WHEREFORE, the United States again respectfully requests this Court amend the conditions of release for the fifteen defendants listed above and order that those defendants refrain from possessing a firearm, destructive device, or other dangerous weapon while on pre-trial release.

Respectfully submitted,

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Acting United States Attorney for the  
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